



Dallas County, Texas<sup>1</sup> for the reasons set forth in the Brief in Support of this Response, and Defendant's motion to dismiss should be denied for this reason. To the extent the Court finds any deficiency in Plaintiff's Complaint, it is requested that Plaintiff be granted leave to amend to cure any deficiency.

WHEREFORE, PREMISES CONSIDERED, Plaintiff Valerie Jackson prays the Court deny Defendant's Motion to Dismiss. Plaintiff further prays for any such other and further relief to which she may be justly entitled.

Respectfully submitted,

**SCOTT H. PALMER, P.C.**

/s/Scott H. Palmer  
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ATTORNEYS FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was forwarded to all counsel of record, in a manner authorized by Rule 5, of the Federal Rules of Civil Procedure, on August 12, 2019.

/s/Scott H. Palmer  
SCOTT H. PALMER

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<sup>1</sup> Plaintiff is no longer pursuing claims against Brenda Devers, Lola Pugh, Selma Littles, Pamela Nixon, or Unknown Dallas County Employees I-II, IV-XIII.